



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

MEMO ENDORSED

July 23, 2025

7-24-25

BY ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

The Court will arraign deft.
And hold an initial conf.
Sept. 8, 2025, at 2:30 PM. -
time is excluded in the
interest of justice
Colleen McMahon

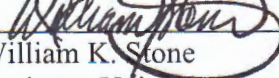
Re: United States v. Jose Olmos, 25 Cr. 315 (CM)

Dear Judge McMahon:

The Government writes this letter motion to make two requests. *First*, the Government requests that the Court set a conference for the defendant's arraignment and initial appearance. Based on conversations with defense counsel and Your Honor's chambers, the Government understands that **Monday, September 8, 2025, at 2:30 PM**, would work for all parties. *Second*, the Government respectfully requests that the time between today and the defendant's arraignment and initial appearance be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The defendant was indicted on July 15, 2025, *see* ECF No. 10, and the defendant's arraignment and initial conference has not yet occurred. Although the Government's position is that the Speedy Trial clock does not begin to run until the date the defendant is arraigned, out of an abundance of caution, the Government seeks the proposed exclusion between today and the date of arraignment. The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the Government time to assemble discovery, the defendant time to review discovery, and the parties an opportunity to discuss the possibility of a pretrial resolution in this case. Defense counsel has informed the Government that the defense consents to this request.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: 
William K. Stone
Assistant United States Attorney
(212) 637-2521

cc (by ECF): Mitchell Schwartz, Esq.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7-24-25